

In the
United States Court of Appeals
For the Federal Circuit

16-1805
(Inter partes reexam 95/002,190)

BEAR CREEK TECHNOLOGIES, INC.

Appellant,

v.

CISCO SYSTEMS, INC.

Appellee.

Appeal from the United States Patent and Trademark Office,
Patent Trial and Appeal Board

**MOTION TO EXTEND TIME
FOR FILING APPELLANT'S OPENING BRIEF**

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FOR FILING APPELLANT'S OPENING BRIEF

Pursuant to the Rules of the United States Court of Appeals for the Federal Circuit, Appellant Bear Creek Technologies, Inc. ("Appellant Bear Creek"), respectfully requests a thirty (30) day extension of time to file its Opening Brief. Appellant's Opening Brief is presently due on June 6, 2016. If the requested extension is granted, the new due date would be July 6, 2016. This is the first extension sought by Appellant Bear Creek in this appeal.

Appellant seeks this extension for the following reasons. Appellant's principal counsel, the undersigned, was just retained in this case yesterday, May 24, 2016, less than two weeks before the current due date of June 6, 2016. Meanwhile, Appellant's principal counsel is also responsible for other matters handled by his law firm during that time frame. Because of these factors, Appellant's counsel will not have sufficient time to prepare its Opening Brief.

Appellees do not oppose this motion.

For the above reasons, Appellant believes that a thirty (30) day extension of time, until July 6, 2016, is reasonable and asks the Court to grant this motion.

May 25, 2016

Respectfully submitted,

/s/Anthony L. Miele

Anthony L. Miele

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Attorney for Appellant

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DECLARATION OF ANTHONY L. MIELE

1. I am an attorney in the law firm of Miele Law Group, and am principal counsel for Appellant Bear Creek Technologies, Inc. (“Appellant”). I submit this declaration of counsel in connection with Appellant’s Motion for an Extension of Time for Filing Appellant’s Opening Brief, which seeks to extend the due date of Appellant’s Opening Brief from June, 6, 2016 to July 6, 2016 (thirty days).

2. All of the facts set forth in the motion are true and correct, and are based on my personal knowledge.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 25, 2016

/s/Anthony L. Miele

Anthony L. Miele

Miele Law Group

165 Main Street, Suite 304

Medway, MA 02053

Telephone: (857) 891-7660

tony@iplawcircle.com

Attorney for Appellant

BEAR CREEK TECHNOLOGIES, INC.

FORM 30. Certificate of Service

UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT

CERTIFICATE OF SERVICE

I certify that I served a copy on counsel of record on
by:

- ☐ US mail
☐ Fax
☐ Hand
☒ Electronic Means
(by email or CM/ECF)

Name of Counsel

Signature of Counsel

Law Firm

Address

City, State, ZIP

Telephone Number

FAX Number

E-mail Address

NOTE: For attorneys filing documents electronically, the name of the filer under whose log-in and password a document is submitted must be preceded by an "/s/" and typed in the space where the signature would otherwise appear. Graphic and other electronic signatures are discouraged.

UNITED STATES COURT OF APPEALS FOR THE FEDERAL CIRCUIT

Bear Creek Technologies, Inc.

v.

Cisco Systems, Inc.

Case No. 16-1805

CERTIFICATE OF INTEREST

Counsel for the:

☐ (petitioner) ☒ (appellant) ☐ (respondent) ☐ (appellee) ☐ (amicus) ☐ (name of party)

certifies the following (use "None" if applicable; use extra sheets if necessary):

1. Full Name of Party Represented by me	2. Name of Real Party in interest (Please only include any real party in interest NOT identified in Question 3) represented by me is:	3. Parent corporations and publicly held companies that own 10 % or more of stock in the party
Bear Creek Technologies, Inc.	N/A	None.

4. The names of all law firms and the partners or associates that appeared for the party or amicus now represented by me in the trial court or agency or are expected to appear in this court (**and who have not or will not enter an appearance in this case**) are:

Jeffrey D. Karceski of Thomas & Karceski, P.C., Lawrence K. DeMeo of Manion Gaynor and Manning LLP, and Anthony L. Miele of Miele Law Group

May 24, 2016

Date

/s/ Anthony L. Miele

Signature of counsel

Please Note: All questions must be answered

Anthony L. Miele

Printed name of counsel

cc: All Counsel of Record

Reset Fields